

**FILED**

AUG 20 2024

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA )

v. )

ALBERT MAXIMILLIAN JEREMIAS )

Criminal No. 24-

[UNDER SEAL]

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA**INDICTMENT MEMORANDUM**

AND NOW comes the United States of America, by its attorneys, Eric G. Olshan, United States Attorney for the Western District of Pennsylvania, and Jacqueline C. Brown, Assistant United States Attorney for said district, and submits this Indictment Memorandum to the Court:

**I. THE INDICTMENT**

A federal grand jury returned a four-count Indictment against the above-named defendant for alleged violations of federal law:

<b><u>COUNT</u></b>	<b><u>OFFENSE/DATE</u></b>	<b><u>TITLE/SECTION</u></b>
One	Attempted Transfer of Obscene Material to a Minor From on or about January 30, 2023, through on or about February 7, 2023	18 U.S.C. § 1470
Two	Attempted Transfer of Obscene Material to a Minor On or about February 28, 2023	18 U.S.C. § 1470
Three	Attempted Coercion and Enticement of a Minor to Engage in Illegal Sexual Activity From on or about April 24, 2023, through on or about April 25, 2023	18 U.S.C. § 2422(b)
Four	Attempted Transfer of Obscene Material to a Minor From on or about May 4, 2023, through on or about May 15, 2023	18 U.S.C. § 1470

## **II. ELEMENTS OF THE OFFENSES**

### **A. As to Counts One, Two and Four:**

In order to establish the crime of Attempted Transfer of Obscene Material to a Minor, in violation of 18 U.S.C. § 1470, the government must prove all of the following essential elements beyond a reasonable doubt:

1. The Defendant knowingly used any means or facility of interstate commerce to transfer obscene matter; and
2. The Defendant believed that he was transferring the matter to an individual under the age of 16 years; and
3. The Defendant knew at the time of the transfer the general nature of the contents of the matter; and
4. The matter is obscene.

Title 18, United States Code, Section 1470.

### **B. As to Count Three:**

In order to establish the crime of Attempted Coercion and Enticement of a Minor to Engage in Illegal Sexual Activity, in violation of 18 U.S.C. § 2422(b), the government must prove all of the following essential elements beyond a reasonable doubt:

1. That the Defendant used the mail or any means or facility of interstate or foreign commerce;
2. To knowingly attempt to persuade, induce, entice, or coerce an individual under the age of 18 years;

3. To engage in prostitution or any sexual activity for which any person can be charged with a criminal offense.

Title 18, United States Code, Section 2422(b).

### **III. PENALTIES**

**A. As to Counts One, Two, and Four: Attempted Transfer of Obscene Material to a Minor (18 U.S.C. § 1470):**

1. Imprisonment of not more than ten (10) years (18 U.S.C. 1470).
2. A fine of \$250,000.00 (18 U.S.C. § 3571(b)(3)).
3. A term of supervised release of not more than 3 years (18 U.S.C. § 3583(b)).
4. Any or all of the above.

**B. As to Count Three: Attempted Coercion and Enticement of a Minor to Engage in Illegal Sexual Activity (18 U.S.C. § 2422(b)):**

1. Imprisonment of not less than ten (10) years and not more than life (18 U.S.C. § 2422(b)).
2. A fine of not more than \$250,000.00 (18 U.S.C. § 3571(b)(3)).
3. Supervised release for any term of years not less than 5, or up to life (18 U.S.C. § 3583(k)).
4. Any or all of the above.

### **IV. MANDATORY SPECIAL ASSESSMENT**

A mandatory special assessment of \$100.00 must be imposed at each count upon which the defendant is convicted, pursuant to 18 U.S.C. § 3013.

With respect to Count Three of the Indictment, an additional special assessment of \$5,000.00 shall be imposed as the offense was committed after May 29, 2015, and is located within Chapter 117 of Title 18, United States Code. 18 U.S.C. § 3014(a).

**V. RESTITUTION**

Restitution may be ordered in this case, together with any authorized penalty, as part of the defendant's sentence pursuant to 18 U.S.C. §§ 3663, 3663A, and 2429.

**VI. FORFEITURE**

As set forth in the Indictment, forfeiture may be applicable in this case.

Respectfully submitted,

ERIC G. OLSHAN  
United States Attorney

*/s/ Jacqueline C. Brown*  
JACQUELINE C. BROWN  
Assistant U.S. Attorney  
PA No. 330010